

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TONYA GRAY,

Plaintiff,

v.

CASE NO.: 08-12882
HON. PATRICK J. DUGGAN
MAG/JUDGE MICHAEL HLUCHANIUK

CITY OF LINCOLN PARK and
OFFICER WISE,

Defendants.

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PROTECTIVE ORDER

At a session of said Court, held in the United States
District Courthouse for the Eastern District of
Michigan, Southern Division on: October 10, 2008.

**PRESENT: THE HONORABLE PATRICK J. DUGGAN
U.S. District Court Judge**

IT IS HEREBY ORDERED that the documents produced by or on behalf of the City of
Lincoln Park will be subject to the following protective conditions:

1. The parties hereby recognize that all information/documents to be released by
the Defendants are confidential information/documents pertaining in part, but not limited to
police policies and procedures, and that the dissemination of said information/documents is
prohibited.

2. The information/documents shall be used solely and exclusively for purposes of this lawsuit. Such information shall not be used in or for other cases, proceedings or disputes, or for any municipal, commercial, business, competitive or any other purpose whatsoever.

3. The aforementioned information/documents may not be disclosed to any person other than parties, counsel of record for the respective parties to this litigation, the paralegal and clerical staff of same, expert witnesses or consultants engaged by counsel, and the court and court personnel, under such safeguards as the court may direct so as to preserve and to protect the confidentiality of information/documents referenced herein.

4. All the persons to whom this confidential information and/or documents are disclosed are hereby enjoined from using the same except for preparation for trial and in the trial of this action (under such safeguards as the court may require) and from disclosing the same to any other person except as provided herein. A breach of the provisions of this Order shall be subject to appropriate sanctions, in the discretion of the court, as authorized by any statute, rule or the inherent power of the court, or as otherwise provided by law.

5. The provisions of this Order shall survive and remain in full force and effect after the entry of final judgment (including any appellate proceedings) in this case, whether by settlement or litigation.

6. The agreement of the parties embodied in this Order does not constitute an admission or agreement that any document or information is admissible as evidence in this case. Designation of any information as subject to this Order shall have no meaning or effect

whatsoever with respect to the substantive issues in this proceeding or the claim or defenses of any party hereto.

S/Patrick J. Duggan
Patrick J. Duggan
United States District Judge

Dated: October 10, 2008

I hereby certify that a copy of the foregoing document was served upon counsel of record on October 10, 2008, by electronic and/or ordinary mail.

S/Marilyn Orem
Case Manager

APPROVED AS TO FORM AND CONTENT:

By ***/s/Audrey J. Forbush***
AUDREY J. FORBUSH (P41744)
Attorney for Defendants

By ***/s/Kelly A. Kruse (w/consent)***
KELLY A. KRUSE (P45538)
Attorney for Plaintiff

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